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*Attorneys for Defendants,
Business Financial Solutions Advisory
LLC, Ryan Carroll, Max K. Day,
Max O. Day, Michael Day, Dreams To
Reality LLC, Evo Maxx LLC, HouTex
Farm Equity Partners LLC, MKD Family
Beneficiary, LLC, MKD Family Private
Management Company, LLC, MKD
Investment Advisor, LLC, Max Day
Consulting, LLC, Precision Trading
Group, LLC, Providence Oak Properties,
LLC, WA Amazon Seller LLC, WA
Distribution LLC, WWKB LLC, Yax
Ecommerce LLC, Yax IP and Management
Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

DAVID HOUGH; et al.,

Plaintiff,

vs.

RYAN CARROLL; et al.,

Defendant.

Case No.: 2:24-cv-02886-WLH

**DECLARATION OF SUSAN
ANHALT IN SUPPORT OF
SUPPLEMENTAL SUBMISSION
FOR RELEASE OF FUNDS FOR
COUNSEL**

Judge: Hon. Wesley L. Hsu

DECLARATION OF SUSAN ANHALT

I, Susan Anhalt, declare as follows:

1. I am an attorney with a corporate law practice in Los Angeles County.

2. I have personal knowledge of the facts stated herein, and if called to testify, I could and would do so competently.

3. I make this declaration in support of the Supplemental Submission for Release of Funds for Counsel.

4. I assisted Max K. Day and Michael Day in identifying and interviewing alternate litigation counsel in the Los Angeles area to represent the Day Defendants in this litigation.

5. I discussed the litigation the Days are involved in with six firms.

6. None of the six firms were willing to accept representation of the Day Defendants without a change to the Order Discharging Order to Show Cause re Preliminary Injunction and Granting Preliminary Injunction Freezing Assets, dated May 13, 2024 (the "May 13 Order") allowing for the payment by the Day Defendants of ongoing legal fees and costs as they become due as well as a substantial retainer at the initiation of the firm's representation.

7. I assisted Max and Michael Day in interviewing prospective counsel and prospective counsel informed the Days that in order for them to agree to substitute in as counsel of record for the Day Defendants, there would need to be a modification to the May 13 Order that would make it clear that the Day Defendants would have an unfettered ability to pay attorneys' fees and costs on an ongoing basis as invoices become due without requiring that the Days seek Court approval for each payment.

8. Neither myself nor my law firm have been paid for the assistance provided to Max K. Day and Michael Day. Additionally, neither myself nor my law

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1 firm are seeking payment for the time I spent assisting the Days find new counsel.

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3 I declare under penalty of perjury under the laws of the State of California that
4 the foregoing is true and correct.

5 Executed this January 9, 2025 at Calabasas, California.

6
7 Susan Anhalt

Susan Anhalt (Jan 10, 2025 07:14 PST)

SUSAN ANHALT

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10 4938-9138-8942, v. 2